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ADMINISTRATIVE HEARING
COMMISSION

**BEFORE THE ADMINISTRATIVE HEARING COMMISSION
STATE OF MISSOURI**

W. DALE FINKE, Director
Department of Insurance
State of Missouri,

Petitioner,

v.

TIFFANY NOEL SPARKS,

Respondent.

Serve at:
1780 225th Street.
Sauk Village, IL 60411
(708) 724-7743

CASE NO. 06-0523215C

COMPLAINT

W. Dale Finke, Director of the Missouri Department of Insurance, for his Complaint against Respondent, Tiffany Noel Sparks, states as follows:

1. Petitioner is the Director of the Missouri Department of Insurance whose duties, pursuant to Chapters 374 and 375 of the Revised Statutes of Missouri, include the supervision and regulation of licensed insurance producers.

2. At all times mentioned herein, Respondent was a licensed insurance producer (license No. PR320861) in the State of Missouri. Respondent's insurance license expired on November 21, 2005.

3. This Commission has jurisdiction over this Complaint pursuant to § 621.045 RSMo (2000).

COUNT I

4. Petitioner re-alleges and expressly incorporates the allegations in paragraphs 1–3.

5. Respondent has had an insurance producer license, or its equivalent, denied, suspended or revoked in another state, province, district or territory, a ground for discipline under § 375.141.1(9), RSMo (Cum. Supp. 2005).

6. The facts are as follows:

a. On or about May 10, 2005, Respondent had revoked, suspended or denied an insurance producers license, or its equivalent, by the state of California.

b. On or about August 1, 2005, Respondent had revoked, suspended, or denied an insurance producers license, or its equivalent, by the state of Connecticut.

c. On or about November 7, 2005, Respondent had revoked, suspended or denied an insurance producer license, or it equivalent, by the state of Kansas.

7. As a result, sufficient grounds exist for disciplining Respondent's insurance license pursuant to § 375.141.1(9), RSMo (Cum. Supp. 2005).

COUTN II

8. Petitioner re-alleges and expressly incorporates the allegations in paragraphs 1–3.

9. Respondent has used fraudulent, coercive, or dishonest practices, or has demonstrated incompetence, untrustworthiness or financial irresponsibility in the conduct of business in this state or elsewhere, a ground for discipline under § 375.141.1(8) RSMo (Cum. Supp. 2005).

10. The facts are as follows:

a. On February 20, 2002, in Case No. CSP048, in the Will County Circuit Court, Will County, Illinois, Respondent was convicted, upon a plea of guilty, of unlawful visitation interference.

b. On November 21, 2003, Respondent filed an application for a fire and casualty broker-agent license in the state of California. Question No. 1 on Respondent's application read in part "Have you ever been convicted of, or are you currently charged with, committing a crime whether or not adjudication was withheld?" to which Respondent answered "No."

c. On May 10, 2005, a Default Decision and Order of Revocation was entered against Respondent. As a result, Respondent's broker-agent license was revoked by the state of California.

d. On November 11, 2003, Respondent filed an application for a Non-resident Individual Producer License with the state of Connecticut. On the application Respondent was asked "Have you ever been convicted of, or are you currently charged with, committing a crime, whether or not adjudication was withheld?" to which Respondent answered "No."

e. On August 1, 2005, an Order for Default Judgment and Order of Revocation was entered against Respondent. As a result, Respondent's insurance producer license was revoked by the state of Connecticut.

11. Respondent has used fraudulent, coercive, or dishonest practices, or has demonstrated incompetence, untrustworthiness or financial irresponsibility in the conduct of business in this state or elsewhere, a ground for discipline under § 375.141.1(8) RSMo (Cum. Supp. 2005).

WHEREAS, based on the foregoing, Petitioner respectfully requests that the Commission make findings of facts and conclusions of law stating that Petitioner has established cause to discipline the insurance license of Respondent.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Douglas M. Ommen", written over a horizontal line.

Douglas M. Ommen
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(573) 751-2619

ATTORNEY FOR PETITIONER
W. Dale Finke, Director
Missouri Department of Insurance